

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of
Petition for Waiver of the Mississippi Farm
Bureau Federation to Participate in Mobility
Fund Phase II Challenge Process

To: The Commission

**PETITION OF THE MISSISSIPPI FARM BUREAU FEDERATION
FOR WAIVER TO PARTICIPATE IN CHALLENGE PROCESS**

Mississippi Farm Bureau Federation (MFBF) respectfully seeks a waiver to participate in the Mobility Fund Phase II (“MF-II”) challenge process. MFBF is neither a governmental entity nor a carrier required to file Form 477 data with the Commission; as such, it is not entitled to participate in the challenge process as a matter of right. However, in adopting the rule governing challenge eligibility, however, the Commission stated that it “anticipate[s] granting waivers in cases in which a . . . business demonstrates a bona fide interest in the challenge process and a plausible ability to submit a valid challenge.”¹ As shown below, MFBF meets these criteria.

MFBF has a bona fide interest in the challenge process. MFBF is a nonprofit corporation organized under the laws of the State of Mississippi. MFBF was formed in 1922 as a not-for-profit advocacy organization. MFBF’s mission is to create an environment in which Mississippi farmers, ranchers, and Farm Bureau members can have a better life and make a better living. MFBF is a

Connect America Fund; Universal Service Reform – Mobility Fund, Order on Reconsideration and Second Report and Order, 32 FCC Rcd 6282, 6304 n. 119 (2017).

grassroots organization with almost 193,000 member families in all of Mississippi's 82 counties, of which approximately 50,000 participate in farming and ranching.

As an organization representing and advocating on behalf of our members in every county in the State of Mississippi, MFBF has an interest in promoting reliable 4G LTE service around the state. Our farm and ranch members increasingly rely on 4G LTE service while working in the fields with precision agriculture equipment that has the ability and the need to be able to communicate with service providers and advisors in distant locations. A rapidly growing number of farmers conduct the majority of their business through their phone. From checking grain prices and making sales to dealing with equipment breakdowns, 4G LTE is essential for today's average farmer. Moreover, farming and ranching is one of the most dangerous professions in the nation. Access to 4G LTE service in the remote locations where this work occurs is essential to providing timely emergency services.

In addition, members of MFBF across Mississippi live, work, and raise families in communities of all sizes. They need reliable access to 4G LTE service to pursue educational endeavors, expand or launch business ventures, and connect with the broader world regardless of their proximity to population. Until a reliable wired broadband infrastructure connects all Mississippians to the digital world, hotspots powered by 4G LTE are essential for students in rural areas to complete homework at home or participate in online learning environments. Telemedicine becomes more and more relevant to rural Mississippians as a way to see specialists hours away. Further, everyday enjoyment of life is increased with connectivity.

MFBF has a plausible ability to submit a valid challenge. With members located in every corner of the state, MFBF is able to quickly identify potential problem areas that may be currently underserved by 4G LTE providers. With regional staff located throughout the state, MFBF will be able to verify information provided by our members and relay it back to our headquarters to

compile and remit to the Commission for use in the MF-II challenge process and are aware of the handset requirements of the challenge process and are prepared to meet them.

Additional information. The Commission requires waiver applicants to “submit the first and last name of the user(s) that should have access to the portal on its behalf, and the email address(es) of the user(s), up to a maximum of three users, as part of its petition for waiver.” MFBF provides the following information regarding the users that should have access to the challenge process portal on its behalf:

Kent Bloodworth (kbloodworth@msfb.org)

Justin Ferguson (jferguson@msfb.org)

Kevin Brown (kbrown@msfb.org)

* * *

For all of these reasons, MFBF respectfully requests a waiver to participate in the MF-II challenge process.

Respectfully submitted,

MISSISSIPPI FARM BUREAU FEDERATION

By: _____

Mike McCormick, President

Kent Bloodworth, General Counsel

MISSISSIPPI FARM BUREAU FEDERATION
6311 Ridgewood Road
Jackson, MS 39211
601.977.4104

July 31, 2018

Submitted via email to mf2challengeprocess@fcc.gov, and to auction904@fcc.gov.